

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KIMBRA CRISWELL,)	
)	
Plaintiff,)	
v.)	C.A. No. 05-CV-00321 GMS
)	
LYDIA ADAIR MCFADDEN and CHRISTIANA)	
CARE HEALTH SERVICES, INC.,)	JURY TRIAL DEMANDED
)	
Defendants.)	

NOTICE OF DEPOSITION DUCES TECUM

PLEASE TAKE NOTICE that the undersigned will take the oral discovery video conferencing deposition of Sumit Dewanjee, M.D. on Thursday, March 29, 2007 at 4:00 p.m. EST (1:00 p.m. MST) at Esquire Deposition Services located at 2929 North Central Avenue, Suite 1680, Phoenix, Arizona 85012 (602) 749-1088. The witness is to bring with him the materials identified in Attachment A. You are invited to attend and participate.

WHITE AND WILLIAMS LLP

/s/ Deborah J. Massaro

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*Attorneys for Defendants,
Lydia McFadden and Christiana Care
Health Services, Inc.*

Dated: March 20, 2007

cc: Esquire

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CARE HEALTH SERVICES, INC.,)	JURY TRIAL DEMANDED
)	
Defendants.)	

CERTIFICATE OF SERVICE

I, Deborah J. Massaro, Esquire, do hereby certify that on this 20th day of March, 2007, two copies of the foregoing **NOTICE OF DEPOSITION DUCES TECUM** were served via electronic filing and delivered U.S. First Class Mail, postage prepaid upon the following:

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Attorneys for Defendants,
Lydia McFadden and Christiana Care
Health Services, Inc.

Dated: March 20, 2007

ATTACHMENT "A"

1. All materials, documents, memoranda, notes, correspondence, photographs, drawings, sketches, writings and other physical evidence which you reviewed, examined and/or considered in connection with your assignment in this case, whether provided by counsel for plaintiff, other representatives of plaintiff, or other parties;
2. All medical, scientific or other literature which you have reviewed, considered or examined in connection with your assignment in this case;
3. All pleadings, discovery papers or deposition transcripts which you reviewed in connection with your assignment in this case;
4. All materials, documents, notes, memoranda, correspondence, writings, photographs, drawings, sketches and other physical evidence of any kind, nature or description whatever, which you created in connection with your assignment in this case, including but not limited to, all preliminary drafts, informal notes, marginal notes or notes by way of interlineation;
5. All documents of any kind, nature or description whatever upon which you will rely, or to which you will refer, or to which you intend to refer at the time of your testimony to be used at the trial of this case;
6. Your billing records and other administrative documentation relating to your assignment in this case;
7. Your current resume or curriculum vitae.